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Lead Counsel for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS)	Master No. 3:15-cv-07658-MAS-RLS
INTERNATIONAL, INC. SECURITIES)	
LITIGATION)	<u>CLASS ACTION</u>
)	
)	Judge Michael A. Shipp
This Document Relates To:)	
)	Magistrate Judge Rukhsanah L. Singh
SECURITIES CLASS ACTION.)	
)	Special Master Dennis M. Cavanaugh,
)	U.S.D.J. (ret.)
)	
)	

JOINT STIPULATION AND [PROPOSED] ORDER RE: REVISED SCHEDULE
IN SECURITIES CLASS ACTION

WHEREAS, on June 18, 2024, the Special Master issued orders as to Lead Plaintiff's Motions to Compel 2013 Workpapers and its Motion to Compel Inclusion of Records Custodian (*see* ECF 1429 and 1430). Pursuant to these orders, PwC is required to produce its 2013 Workpapers and responsive, non-privileged materials in Matthew Magi's custodial files that are captured by the search term and date parameters set forth in Lead Plaintiff's Motion;

WHEREAS, the Parties conferred regarding a schedule for the production of these materials and agreed that: 1) PwC will produce its 2013 Workpapers by June 28, 2024, 2) PwC will produce on a rolling basis (starting by July 9, 2024) responsive, non-privileged materials in Matthew Magi's custodial files and substantially complete that production by August 9, 2024,¹ 3) PwC will produce a privilege log for any withheld or redacted responsive documents by August 23, 2024, and 4) PwC will waive its right to appeal the Special Master's orders as to Lead Plaintiff's Motion to Compel 2013 Workpapers and its Motion to Compel Inclusion of Records Custodian;

WHEREAS, the Stipulation and Proposed Order entered on March 30, 2024 (ECF 1371)—as modified by the parties' agreement reflected in PwC's April 11,

¹ PwC intends to produce all responsive, non-privileged documents by this date, but understands that Valeant may want to review certain documents for Valeant privilege or work product. PwC agrees to submit documents that require Valeant review to Valeant's counsel on a rolling basis, and keep Plaintiff's counsel informed as to the volume and timing of those submissions.

2024 letter to the Special Master—contains deadlines for the remaining case proceedings based on the deadline for compliance for the Special Master’s orders as to Lead Plaintiff’s Motion to Compel 2013 Workpapers and its Motion to Compel Inclusion of Records Custodian;

WHEREAS, because certain of these deadlines will occur in and around various holidays, the Parties negotiated a revised schedule for the remainder of the case proceedings;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that the following schedule shall govern:

Action	Proposed Dates
Deadline for PwC to produce 2013 workpapers	June 28, 2024
Deadline for PwC to produce any expert or current PwC employee cited in support of its opposition to class certification for deposition	July 9, 2024
Deadline for Plaintiff to file its Reply in Support of Class Certification	July 29, 2024
Deadline for PwC to substantially complete the production of responsive, non-privileged materials in Matthew Magi’s custodial files that are captured by the search term and date parameters set forth in Lead Plaintiff’s Motion to Compel Inclusion of Records Custodian	August 9, 2024
Deadline for PwC for privilege log for Matthew Magi’s custodial files	August 23, 2024

Fact Discovery Cutoff ²	November 22, 2024
Deadline to serve affirmative expert reports	December 18, 2024
Deadline to serve rebuttal expert reports	February 21, 2025
Deadline to serve reply expert reports	April 4, 2025
Expert Discovery Cutoff	May 9, 2025
Deadline to file Dispositive Motion(s)	June 6, 2025
Deadline to file Opposition(s) to Dispositive Motion(s)	August 8, 2025
Deadline to file Reply or Replies in support of Dispositive Motion(s)	September 19, 2025
Objection(s) to proposed expert testimony under FRE 702	90 days before the final pretrial conference
Opposition (s) to any objection(s) to proposed expert testimony under FRE 702	60 days before the final pretrial conference
Reply in support of any objection(s) to proposed expert testimony under FRE 702	30 days before the final pretrial conference
Parties to designate potential trial witnesses and proposed exhibits	45 days before the final pretrial conference
Parties to file a joint set of jury instructions, proposed jury instructions which are objected to by any other party and points and authorities in support of and in opposition to the objected to instructions	45 days before the final pretrial conference
Final Pretrial Conference	TBD

² Tucson is pursuing depositions of certain out-of-country witnesses through the letters rogatory process or through letters of request under the Hague Evidence Convention. *See* ECFs 1412-1414, 1431-1434. If these three depositions are not able to be completed by the Fact Discovery Cutoff, but can be completed by the deadline to serve reply expert reports, PwC will not oppose a request by Tucson to modify the schedule to accommodate the out-of-country depositions on the grounds that fact discovery has closed. Tucson reserves all rights to file motions to take additional depositions of out-of-country witnesses, and move for adjustments to the schedule (if any) that it believes are necessary to accommodate those depositions. PwC reserves all other rights.

Proposed Trial Date	TBD
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DATED: July 1, 2024

CHIESA SHAHINIAN & GIAN TOMASI PC

By: /s/ A. Ross Pearlson

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DATED: July 1, 2024

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Attorneys for Lead Plaintiff

* * *

ORDER

IT IS SO ORDERED.

DATED: 7/10/14

Dennis M. Cavanaugh
THE HON. DENNIS M. CAVANAUGH (RET.)
SPECIAL MASTER